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United States Bankruptcy - Excusable Neglect Hearing

I Jurisdiction And Venue,

- 1) This is a chapter (11) Bankruptcy Case Claim in which the Creditor, Christopher Allan Freeman Begs this great Court for his claim to be recognized as being filed timely. This court has the Authority under the federal Rule of bankruptcy procedure 9006 (B)(1.) This Creditor is requesting for what Constitutes as "Excusable Neglect" to be applied to his claim. This creditors personal injury Claimant proof of claim Form (claim # 628754) were filed by the Purdue Pharma Claims processing Center after the July 30, 2020 Bar date.

cc "If facts"

- 2) The Global Pandemic has Slowed and Halted my life Due to the Nation wide Lock-Down my ability to Communicate and Correspond has become hindered and also Come to a Stand Still and was out of my control. At the time this Creditor tried to acquire the required claim documents the United States postal Service was lacking in funds and due to the affected States were informed mail would be late for outgoing and incoming, this delay transpired at the same time and several months prior to and after the courts new "Bar Date" this was out of my control.

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I am Currently Incarcerated and have been Since 5-20-2020 in Washington State Department of Corrections. I only receive 2 hrs of time out of my cell a day and no publications except USA Today. That has to be purchased from an Outside Vender. I am Indigent so I am unable to purchase USA today. I am Ignorant to what is transpiring in the outside world. As soon as I could I sent a request for the claim forms to the Purdue Pharma claims center and my proof of claim number is #628754.

I am Christopher Freeman I did not Attempt to file my claim forms in the fastest time frame possible. With regards to my Current Incarceration and Constant State of Lockdowns the Global Pandemic put everything out of my control.

III

The creditor Christopher Freeman, alleges that he attempted to follow the courts requirements and rules as best as he was Physically Capable of doing. In respect to my current Incarceration this creditor "Acted" in good faith. "(Fed Rules Bankrupt Procedure, Rule 9006(B)(1)) 11 U.S.C.A. CUI GVF (LUX) master SAR V. Lelan Bros. Holdings Inc. 445 B.R. 137 (S.D.N.Y. 2011) the Creditor is the movant requesting for the acceptance of

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this claims extension of the Bar Date so this creditors claims maybe reconized as timely.

★ Excusable ability to file a proof of Claim after the expiration of the claim Bar Date is a flexible one and excusable Neglect may include "Intervening Circumstances" beyond the Creditors control. (Fed. R. Bank. R.P. 9006(B) (1) in RE motors Liquidation Company 576 BR 761 (Bank. R.S. D.N.Y. 2017) Under the Excusable Neglect Standard Governing the filing of Late proof of Claim.

Congress plainly Contemplated that Courts would be permitted, when appropriate to accept Late filings caused by inadvertance mistake or carelessness as well as by Intervening Circumstances beyond a party's control. (Fed. B. Bank - R.P. 9006(B) In Re - energy future holdings Corp. 619 B.R. 99 (Bank R D Del 2020)

IV

Wherefore Creditor respectfully requests that this great Court enter Judgment Granting the recognition of (A) personal Injury (B) General Claims proof of claim forms:

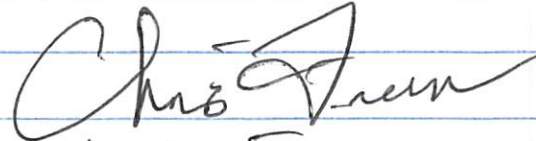
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Dated this 4th day of April 2022
respectfully Submitted

"Verification"

I have read the forgoing and here by
Verify that the matters alleged therein
are true as to my Information and
belief and to these I believe therein to
be true.

I Certify under penalty of perjury
that the forgoing is true and correct.


Chris Freeman

DOB. 

SSN. 

FILED
U.S. DISTRICT COURT
SD, OF N.Y.
2022 APR -7 P 1:07